

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re : Chapter 9
: Case No. 13-53846
CITY OF DETROIT, MICHIGAN, :
Debtor : Hon. Steven W. Rhodes
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**STIPULATION FOR ENTRY OF ORDER REGARDING
SETTLEMENT AND WITHDRAWAL OF CLAIM NO. 3633 OF
COMPUWARE CORPORATION AND WITHDRAWAL OF CURE OBJECTION**

Compuware Corporation (“Compuware”) and the City of Detroit, Michigan (the “City”), by and through their undersigned counsel, stipulate as follows in support of the entry of the *Order Regarding Settlement and Withdrawal of Claim No. 3633 of Compuware Corporation and Withdrawal of Cure Objection* attached hereto as **Exhibit 1**.

1. On February 18, 2014, Compuware filed a proof of claim [Claim No. 1041] in the amount of \$267,508.65.
2. On March 6, 2014, Compuware filed an amended proof of claim [Claim No. 3633] (as amended, the “Claim”) in the amount of \$241,350.00. Compuware’s original Claim No. 1041 was expunged as an amended and superseded claim.
3. Upon discussion and review of the records, the parties have determined that the outstanding amount owed on the Claim should be reduced to \$22,875.00 (“Outstanding Claim Amount”).
4. Compuware also filed its Objection to Proposed Cure Amount (Dkt. 8586) and Cure Amount Objection.

5. In resolution of Compuware's Claim, the parties have agreed that the City will pay \$11,437.50 on the Claim as a cure amount, in full satisfaction of the Outstanding Claim Amount (the "Settlement").

6. In consideration of the Settlement, Compuware agrees to withdraw Claim No. 3633, which constitutes Compuware's only outstanding claim in this bankruptcy, whether for the pre-petition or post-petition period, and to withdraw its Objection to Proposed Cure Amount (Dkt. 8586) with prejudice.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties' stipulation.

Respectfully submitted by: COMPUWARE CORPORATION	FOLEY & LARDNER, LLP
By: <u>/s/ Judy Calton (with consent)</u> Judy Calton Honigman Miller Schwartz and Cohn LLP 660 Woodward Avenue Suite 2290 Detroit, MI 48226 Phone: (313) 465-7344 jcalton@honigman.com	By: <u>/s/ John A. Simon</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com
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Dated: February 6, 2015	By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 swansonm@millercanfield.com green@millercanfield.com